

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SHANNON DAVES <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	Case No. 3:18-CV-0154
v.)	Judge David C. Godbey
)	
DALLAS COUNTY, TEXAS, <i>et al.</i> ,)	
)	
Defendants.)	

NOTICE OF APPEAL

Pursuant to Federal Rule of Appellate Procedure 4(a)(4)(B), Plaintiffs Shannon Daves, Shakena Walston, Erriyah Banks, Destinee Tovar, Patroba Michieka, and James Thompson and the Plaintiff class (“Plaintiffs”) hereby appeal to the United States Court of Appeals for the Fifth Circuit from (a) the Memorandum Opinion and Order entered in this case on September 20, 2018 (Dkt. 164), and (b) the Preliminary Injunction Order entered in this case on the same date (Dkt. 165).

As part of this notice of appeal, Plaintiffs submit the requisite filing fee of \$505 and respectfully request the district clerk to prepare the record on appeal pursuant to Federal Rule of Appellate Procedure 10(a). Plaintiffs will order from the court reporter a transcript of such parts of the proceedings not already on file as the appellants consider necessary, as required by Federal Rule of Appellate Procedure 10(b)(1)(A).

Respectfully Submitted,

/s/ Elizabeth Rossi
Elizabeth Rossi (*Pro Hac Vice*)
D.C. Bar No. 1500502
Alec Karakatsanis (*Pro Hac Vice*)

/s/ Trisha Trigilio/
Trisha Trigilio
Texas Bar No. 24075179
Andre Segura

D.C. Bar No. 999294
A. Dami Animashaun** (*Pro Hac Vice*)
N.Y. Bar No. 5552849
Civil Rights Corps
910 17th Street NW, Suite 200
Washington, DC 20006
Tel: (202) 599-0953
Fax: (202) 609-8030
elizabeth@civilrightscorps.org
alec@civilrightscorps.org
dami@civilrightscorps.org

/s/ Kali Cohn
Kali Cohn
Texas Bar. No. 24092265
ACLU Foundation of Texas
N.Y. Bar No. 5021647
ACLU Foundation of Texas
6440 N. Central Expressway
Dallas, TX 75206
Tel: (214) 346-6577
Fax: (713) 942-8966
kcohn@aclutx.org

N.Y. Bar No. 5021647
ACLU Foundation of Texas
5225 Katy Freeway, Suite 350
Houston, Texas 77007
Tel: (713) 942-8146
Fax: (713) 942-8966
ttrigilio@aclutx.org
asegura@aclutx.org

/s/ Andrea Woods
Andrea Woods (*Pro Hac Vice*)
Washington Bar Number: 48265
Brandon J. Buskey (*Pro Hac Vice*)
Alabama Bar Number: ASB-2753-A50B
ACLU Foundation
Criminal Law Reform Project
New York, NY 10004
Tel: (212) 284-7364
Fax: (212) 549-2654
awoods@aclu.org
bbuskey@aclu.org

s/ Susanne Pringle
Susanne Pringle
Texas Bar No. 24083686
Emily Gerrick
Texas Bar No. 24092417
Texas Fair Defense Project
314 E. Highland Mall Blvd., Suite 108
Austin, Texas 78752
Tel: (512) 637-5220
Fax: (512) 637-5224
springle@fairdefense.org
egerrick@fairdefense.org

Attorneys for Plaintiffs

** Admitted solely to practice law in New York; not admitted in the District of Columbia. Practice is limited pursuant to D.C. App. R. 49.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2018, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court.

/s/ Elizabeth Rossi
Elizabeth Rossi